

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA**

PRESIDENT DONALD J. TRUMP, 45th President
of the United States of America, in his individual
capacity,

Plaintiff,

v.

SIMON & SCHUSTER, INC., a New York
corporation, ROBERT WOODWARD p.k.a. BOB
WOODWARD, an individual, and PARAMOUNT
GLOBAL, a Delaware corporation, f/k/a Viacom
Inc., successor by merger to CBS Corporation, a
Pennsylvania corporation f/k/a Westinghouse
Electric Corporation,

Defendants.

3:23-cv-02333-RV-ZCB

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

COME NOW JOINTLY, all parties to this action, by and through their undersigned counsel, and move this Court for entry of a Stipulation and Confidentiality Agreement and Order (the “Protective Order”), which has been seen and agreed to by the parties, and is filed herewith. As further grounds for this Motion, the parties stipulate as follows:

1. This action arises under the Declaratory Judgment Act, 28 U.S.C. § 2201 et seq., the Copyright Act, 17 U.S.C. § 101 et seq., and *inter alia* the Florida

Deceptive and Unfair Trade Practices Act, unjust enrichment and breach of contract; and

2. The parties agree that a protective order is needed to expedite the flow of discovery material, facilitate the prompt resolution of disputes over confidentiality, adequately protect sensitive documents, financial information and other material entitled to be kept confidential, and ensure that confidentiality protection is afforded only to documents, information, material and testimony that may be so entitled; and

3. Entry of a protective order will not interfere with the progress of this case or the rights of any parties.

WHEREFORE, the parties respectfully request that the attached Protective Order filed herewith be entered by the Court.

Respectfully submitted this 28th day of June, 2023.

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/s/ Robert Garson

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